

EXHIBIT 1

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

DENNIS HANSCOM, on behalf of himself and
all others similarly situated,

Plaintiff,

vs.

NORDSEC LTD., NORDSEC B.V., NORDVPN
S.A., NORD SECURITY INC., and TEFINCOM
S.A. d/b/a NORDVPN,

Defendants.

CASE NO. 3:24-CV-00277-KDB-DCK

**DECLARATION OF OLGA SINKEVICIENE IN SUPPORT OF DEFENDANT
NORDSEC LTD'S MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

Olga Sinkeviciene declares as follows:

1. I am the director at NordSec Ltd. I am competent to testify and make this declaration based on my personal knowledge.
2. I understand that this litigation involves claims that Nordvpn S.A. charged a customer in North Carolina for a recurring subscription to retail consumer VPN and related services, allegedly without the customer's consent. I further understand that the customer first subscribed to NordVPN and related services in August 2023.
3. NordSec Ltd is a private limited liability company organized under the laws of England & Wales, and its principal place of business is in London, England. NordSec Ltd is a holding company that previously owned the intellectual property of the Nord brand. NordSec Ltd is not involved in providing VPN or related services to any customers in the United States or elsewhere, and it was not involved in providing any such services in or before 2023. NordSec Ltd did not charge any customer in the United States, including Plaintiff, for any such services at any time, and it did not enter into any contract with Plaintiff.

4. NordSec Ltd maintains its own funds in an independent account sufficient to operate its business.

5. NordSec Ltd is organized and governed by its own articles of association and other corporate statutory documents, as a stand-alone entity.

6. NordSec Ltd is managed by its own board and holds its own shareholder meetings, as required.

7. NordSec Ltd accurately maintains its own business records, including financial records, minutes from shareholder meetings, corporate tax filings, and other corporate documents, such as the articles of association and corporate resolutions.

8. NordSec Ltd does not share officers or directors with the other Defendants.

9. NordSec Ltd does not have offices, employees, or contractors in North Carolina.

10. NordSec Ltd is not a sales entity and does not conduct any client-facing activities.

11. NordSec Ltd has never purchased or used advertising space or held an event of any kind in North Carolina for retail consumer VPN or related services.

12. NordSec Ltd does not solicit business in North Carolina and has no long-term business activities in North Carolina.

13. NordSec Ltd has never made in-person contact with any resident of North Carolina.

14. NordSec Ltd does not ship products into North Carolina.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED this 27th day of June, 2024.



Director

Olga Sinkeviciene